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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.

CASE NO. 23-13359 (VFP)

CHAPTER 11

**OBJECTION OF CREEKSTONE/JUBAN I, LLC, TO NOTICE TO CONTRACT  
PARTIES TO POTENTIALLY ASSUMED EXECUTORY CONTRACTS AND  
UNEXPIRED LEASES  
(Related Docket No.: 714)**

Creekstone/Juban I, LLC (“**Creekstone**”), by and through its attorneys, Law Offices of Kenneth L. Baum LLC, by way of objection to the Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Dkt. No. 714] (the “**Cure Notice**”), states as follows:

1. Creekstone, as landlord, and Bed Bath & Beyond Inc., as tenant, are parties to a Lease Agreement dated as of June 2013, as amended (the “**Lease**”), for the Debtor’s use of retail premises at a shopping center commonly known as Juban Crossing, located at Interstate Highway 12 and Juban Road, in Denham Springs, Louisiana (the “**Premises**”).
2. The Cure Notice includes, *inter alia*, a potential assumption and assignment of the Lease. The Cure Notice correctly states that there are currently \$3,079.60 in monetary arrears under the Lease.

3. Creekstone specifically reserves its right to object to any other relief sought by the Debtors in connection with the assumption of the Lease, including, but not limited to, any additional amounts coming due under the Lease and any assignee's proposed adequate assurance of future performance (including, but not limited to, such adequate assurance pursuant to Sections 365(b) and 365(f) of the Bankruptcy Code).

WHEREFORE, Creekstone respectfully requests that any order in connection with the assumption and assignment of the Lease adhere to the requirements set forth above and such other and further relief as the Court deems just and proper.

Respectfully submitted,

LAW OFFICES OF KENNETH L. BAUM  
LLC  
Attorneys for Creekstone/Juban I, LLC

By: /s/ Kenneth L. Baum  
Kenneth L. Baum

DATED: July 5, 2023